

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

CHRISTINE BRYANT on behalf of herself)
and all other persons similarly situated, known)
and unknown.)

Plaintiff,

V.

COMPASS GROUP USA, INC. and 365
RETAIL MARKETS, LLC

Defendants.

Case No. 1:19-cv-06622

Honorable Virginia M. Kendall

**JOINT MOTION FOR FOURTH AND FINAL EXTENSION OF DEADLINE TO FILE
MOTION FOR PRELIMINARY APPROVAL AND TO RESET STATUS HEARING**

For the reasons below, the parties request that the Court grant a 14-day extension, until October 28, 2021, to file a motion for preliminary approval of the parties' class action settlement and to reset the October 19th status hearing to a date after October 28th.

1. This case is a proposed class action for alleged violations of the Biometric Information Privacy Act.

2. On July 21, 2021, the parties filed a Joint Motion for Extension of Deadline to File Motion for Preliminary Approval and to Reset Status Hearing. The Joint Motion explained that Plaintiff’s counsel did not yet have the information they needed from Defendants to issue subpoenas. Counsel for Defendant 365 Retail Markets provided Plaintiff’s counsel with a portion of that information on July 16, 2021. Counsel for Defendant Compass Group stated that they expected to provide Plaintiff’s counsel with the remainder of that information by July 23, 2021. The Court granted the Joint Motion for Extension on July 26, 2021, extended the preliminary approval filing deadline to August 23rd, and reset the upcoming status hearing to August 26th. Dkt. No. 72.

3. On August 18, 2021, the parties filed a Joint Motion for Second Extension of Deadline to File Motion for Preliminary Approval and to Reset Status Hearing. The Joint Motion explained that Defendant Compass Group had not yet provided Plaintiff's counsel with names and contact information that Plaintiff's counsel needed to serve subpoenas for class member contact information. Compass Group agreed to make best efforts to provide the information by August 27, 2021. The Court granted the Joint Motion for Second Extension on August 19, 2021, extended the preliminary approval filing deadline to September 23rd, and reset the upcoming status hearing to September 27th. Dkt. No. 76.

4. On September 22, 2021, the parties filed a Joint Motion for Third Extension of Deadline to File Motion for Preliminary Approval and to Reset Status Hearing. The Joint Motion explained that the parties needed additional time to finalize the revised settlement documents. The parties further stated that they anticipated this would be the final motion for extension. The Court granted the extension and gave Plaintiff until October 14th to move for preliminary approval and set a status hearing for October 19th. Dkt. No. 80.

5. Since the Court granted the Third Motion for Extension, the parties have conferred further over the revised settlement documents. On October 13, 2021, Defendants' counsel sent Plaintiff's counsel a further revised settlement agreement. The same day, Plaintiff's counsel reviewed the revisions and sent back additional revisions based on Defendant's latest changes. The parties are unable to finalize the settlement agreement in time to meet the preliminary approval filing deadline.

WHEREFORE, the parties request that the Court extend the deadline for filing for preliminary approval to October 28, 2021 and reset the October 19th status hearing to a date after October 28th.

Dated: October 14, 2021

/s/ Zachary C. Flowerree
One of Plaintiff's Attorneys

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Respectfully submitted,

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